

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORKIn re Terrorist Attacks on September 11,  
200103-md-1570  
(GBD)(SN)

This document relates to:

*O'Neill, Sr. et al. v. The Republic of Iraq et al.*, 04-cv-1076 (GBD) (SN)  
*Horace Morris et al. v. Islamic Republic of Iran*, 1:18-cv-05321 (GBD) (SN)  
*Laurence Schlissel et al. v. Islamic Republic of Iran*, 1:18-cv-05331 (GBD) (SN)  
*Bakahityar Kamardinova et al. v. Islamic Republic of Iran*, 1:18-cv-05339 (GBD) (SN)  
*Audrey Ades et al. v. Islamic Republic of Iran*, 1:18-cv-07306 (GBD) (SN)  
*Chang Don Kim et al. v. Islamic Republic of Iran*, 1:18-cv-11870 (GBD) (SN)  
*Alexander Jimenez et al. v. Islamic Republic of Iran*, 1:18-cv-11875 (GBD) (SN)  
*Maureen Moody-Theinert et al. v. Islamic Republic of Iran*, 1:18-cv-11876 (GBD) (SN)  
*Gordon Aamoth Sr. et al. v. Islamic Republic of Iran*, 1:18-cv-12276 (GBD) (SN)  
*Marinella Hemenway et al. v. Islamic Republic of Iran*, 1:18-cv-12277 (GBD) (SN)

**CERTIFICATE OF SERVICE OF JUDGMENTS**

I, Jerry S. Goldman, Esq., declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

I certify that I caused judgments to be served on the Islamic Republic of Iran ("Iran") on February 18, 2020, by delivery to the Clerk of the U.S. District Court for the Southern District of New York, pursuant to the Foreign Sovereign Immunities Act, of such judgments, notices of judgments, and other documents set forth in the transmittal letters, copies of which are annexed hereto, for submission to the U.S. Department of State, along with the requisite service fees, for delivery to the Foreign Minister of Iran via diplomatic means.

Dated: February 18, 2020

Name (Signature):

Name (Print): Jerry S. Goldman, Esq.

# ANDERSON KILL P.C.

Attorneys and Counselors at Law

1251 AVENUE OF THE AMERICAS ■ NEW YORK, NY 10020  
TELEPHONE: 212-278-1000 ■ FAX: 212-278-1733  
www.andersonkill.com

Jerry S. Goldman, Esq.  
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212-278-1569

By Hand Delivery

February 18, 2020

Clerk of the Court, Ruby J. Krajick  
United States District Court  
Southern District of New York  
Office of the Clerk  
500 Pearl Street  
New York, New York 10007

Re: *Bakahityar Kamardinova et al. v. Islamic Republic of Iran*  
Case No.: 1:18-cv-05339 (GBD) (SN); RE: Service of Judgment  
via the Foreign Sovereign Immunities Act

Dear Clerk of the Court, Ruby J. Krajick:

I represent the Plaintiffs in the above-referenced action.

I am writing to request you effect service of the Partial Final Judgment, dated February 5, 2020, MDL ECF No. 5850, on the Defendant, Islamic Republic of Iran, pursuant to 28 U.S.C. §1608(a)(4), at the following address:

Minister of Foreign Affairs  
Ministry of Foreign Affairs of the Islamic Republic of Iran  
Iman Khomeini Avenue  
Tehran, Iran  
ATTN: H.E. Mohammad Javad Zarif

Service on Iran cannot be effected under 28 U.S.C. Sections 1608(a)(1) and (2) because the United States and Iran do not have any special arrangement for service of process upon Iran in accordance with sub-section (1), nor is service permitted by any applicable international convention under the provisions of sub-section (2).<sup>1</sup> See *Valore v. Islamic Republic of Iran*, 700 F. Supp. 2d 52, 70 (D.D.C. 2010). As you are aware, service by mail pursuant to 28 U.S.C. § 1608(a)(3) cannot be effected as demonstrated by the fact that service of original process by mail in the initial phase of the action was not effective and such futile efforts need not be repeated here.

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<sup>1</sup> Iran is not a signatory to the convention of the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters.

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**Anderson Kill P.C.**

February 18, 2020  
Page 2

On September 26, 2018, Plaintiffs served the complaint on Defendant pursuant to 28 U.S.C. § 1608(a)(4). Defendant failed to file an answer or responsive pleading within 60 days from the date that service was effectuated and Partial Final Judgment was entered on February 5, 2020.

Pursuant to 28 U.S.C. § 1608(e), and 22 CFR § 93.2, Plaintiffs now request that Defendant is served with the judgment pursuant to 28 U.S.C. § 1608(a)(4) by first sending the enclosed documents to the following address, which will arrange for diplomatic service:

U.S. Department of State  
SA-29, 4th Floor, 2201 C Street NW  
Washington, DC 20520.  
Attn: Secretary of State, Director of Consular Services, Office of Policy Review and Inter-Agency Liaison (CA/OCS/PRI)

Enclosed please find copies of the following documents, in English and Farsi:

- a. Notice of Judgment prepared in accordance with 22 CFR § 93.2
- b. Order of Judgment for Liability, dated June 21, 2019
- c. Order of Partial Final Judgment for Damages, dated February 5, 2020
- d. Instructions for Appealing Judgment
- e. A copy of 28 U.S.C. 1330, 28 U.S.C. 1391, 28 U.S.C. 1441, and the Foreign Sovereign Immunities Act (28 U.S.C. 1602, et seq.)
- f. Affidavit of translator<sup>2</sup>.

In total, we are providing three complete sets of the documents, in both English and Farsi. In accordance with pages 12-13 of the Court's Foreign Mailing Instructions we are providing two sets for service on Defendant and a set of documents for the Court's file.

We have also enclosed pre-paid FedEx label and envelope for delivery to the address above. Please note that our firm FedEx account number is 628354049.

We further enclose a cashier's check in the amount of \$2,275.00 made payable to "U.S. Embassy Bern."

---

<sup>2</sup> The affidavit of the translator comports with the requirements of NY CPLR 2101(b).

**Anderson Kill P.C.**

February 18, 2020  
Page 3

Should you have any questions or require any additional information  
please do not hesitate to contact me.

Regards,

Jerry S. Goldman

Enclosures

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Clerk of the Court, Ruby J. Krajick  
United States District Court  
Southern District of New York  
Office of the Clerk  
500 Pearl Street  
New York, New York 10007

Re: *Audrey Ades et al. v. Islamic Republic of Iran*  
Case No.: 1:18-cv-07306 (GBD) (SN); RE: Service of Judgment  
via the Foreign Sovereign Immunities Act

Dear Clerk of the Court, Ruby J. Krajick:

I represent the Plaintiffs in the above-referenced action.

I am writing to request you effect service of the Partial Final Judgment, dated February 7, 2020, MDL ECF No. 5876, on the Defendant, Islamic Republic of Iran, pursuant to 28 U.S.C. §1608(a)(4), at the following address:

Minister of Foreign Affairs  
Ministry of Foreign Affairs of the Islamic Republic of Iran  
Iman Khomeini Avenue  
Tehran, Iran  
ATTN: H.E. Mohammad Javad Zarif

Service on Iran cannot be effected under 28 U.S.C. Sections 1608(a)(1) and (2) because the United States and Iran do not have any special arrangement for service of process upon Iran in accordance with sub-section (1), nor is service permitted by any applicable international convention under the provisions of sub-section (2).<sup>1</sup> See *Valore v. Islamic Republic of Iran*, 700 F. Supp. 2d 52, 70 (D.D.C. 2010). As you are aware, service by mail pursuant to 28 U.S.C. § 1609(a)(3) cannot be effected as demonstrated by the fact that service of original process by mail in the initial phase of the action was not effective and such futile efforts need not be repeated here.

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**Anderson Kill P.C.**

February 18, 2020

Page 2

On December 6, 2018, Plaintiffs served the complaint on Defendant pursuant to 28 U.S.C. § 1608(a)(4). Defendant failed to file an answer or responsive pleading within 60 days from the date that service was effectuated and Partial Final Judgment was entered on February 7, 2020.

Pursuant to 28 U.S.C. § 1608(e), and 22 CFR § 93.2, Plaintiffs now request that Defendant is served with the judgment pursuant to 28 U.S.C. § 1608(a)(4) by first sending the enclosed documents to the following address, which will arrange for diplomatic service:

U.S. Department of State  
SA-29, 4th Floor, 2201 C Street NW  
Washington, DC 20520.  
Attn: Secretary of State, Director of Consular Services, Office of Policy Review and Inter-Agency Liaison (CA/OCS/PRI)

Enclosed please find copies of the following documents, in English and Farsi:

- a. Notice of Judgment prepared in accordance with 22 CFR § 93.2
- b. Order of Judgment for Liability, dated June 21, 2019
- c. Order of Partial Final Judgment for Damages, dated February 7, 2020
- d. Instructions for Appealing Judgment
- e. A copy of 28 U.S.C. 1330, 28 U.S.C. 1391, 28 U.S.C. 1441, and the Foreign Sovereign Immunities Act (28 U.S.C. 1602, et seq.)
- f. Affidavit of translator<sup>2</sup>.

In total, we are providing three complete sets of the documents, in both English and Farsi. In accordance with pages 12-13 of the Court's Foreign Mailing Instructions we are providing two sets for service on Defendant and a set of documents for the Court's file.

We have also enclosed pre-paid FedEx label and envelope for delivery to the address above. Please note that our firm FedEx account number is 628354049.

We further enclose a cashier's check in the amount of \$2,275.00 made payable to "U.S. Embassy Bern."

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<sup>2</sup> The affidavit of the translator comports with the requirements of NY CPLR 2101(b).

**Anderson Kill P.C.**

February 18, 2020

Page 3

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Regards,

Jerry S. Goldman

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February 18, 2020

Clerk of the Court, Ruby J. Krajick  
United States District Court  
Southern District of New York  
Office of the Clerk  
500 Pearl Street  
New York, New York 10007

Re: *Estate of John Patrick O'Neill Sr. et al. v. The Republic of Iraq et al.*  
Case No.: 1:04-cv-01706 (GBD) (SN); RE: Service of  
Judgment via the Foreign Sovereign Immunities Act

Dear Clerk of the Court, Ruby J. Krajick:

I represent the Plaintiffs in the above-referenced action.

I am writing to request you effect service of the Partial Final Judgment, dated February 12, 2020, MDL ECF No. 5927, on the Defendant, Islamic Republic of Iran, pursuant to 28 U.S.C. §1608(a)(4), at the following address:

Minister of Foreign Affairs  
Ministry of Foreign Affairs of the Islamic Republic of Iran  
Iman Khomeini Avenue  
Tehran, Iran  
ATTN: H.E. Mohammad Javad Zarif

Service on Iran cannot be effected under 28 U.S.C. Sections 1608(a)(1) and (2) because the United States and Iran do not have any special arrangement for service of process upon Iran in accordance with sub-section (1), nor is service permitted by any applicable international convention under the provisions of sub-section (2).<sup>1</sup> See *Valore v. Islamic Republic of Iran*, 700 F. Supp. 2d 52, 70 (D.D.C. 2010). As you are aware, service by mail pursuant to 28 U.S.C. § 1608(a)(3) cannot be effected as demonstrated by the fact that service of original process by mail in the initial phase of the action was not effective and such futile efforts need not be repeated here.

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**Anderson Kill P.C.**

February 18, 2020

Page 2

On June 24, 2005, Plaintiffs served the complaint on Defendant pursuant to 28 U.S.C. § 1608(a)(4). Defendant failed to file an answer or responsive pleading within 60 days from the date that service was effectuated and Partial Final Judgment was entered on February 12, 2020.

Pursuant to 28 U.S.C. § 1608(e), and 22 CFR § 93.2, Plaintiffs now request that Defendant is served with the judgment pursuant to 28 U.S.C. § 1608(a)(4) by first sending the enclosed documents to the following address, which will arrange for diplomatic service:

U.S. Department of State  
SA-29, 4th Floor, 2201 C Street NW  
Washington, DC 20520.  
Attn: Secretary of State, Director of Consular Services, Office of Policy Review and Inter-Agency Liaison (CA/OCS/PRI)

Enclosed please find copies of the following documents, in English and Farsi:

- a. Notice of Judgment prepared in accordance with 22 CFR § 93.2
- b. Order of Judgment for Liability, dated August 31, 2015
- c. Order of Partial Final Judgment for Damages, dated February 12, 2020
- d. Instructions for Appealing Judgment
- e. A copy of 28 U.S.C. 1330, 28 U.S.C. 1391, 28 U.S.C. 1441, and the Foreign Sovereign Immunities Act (28 U.S.C. 1602, et seq.)
- f. Affidavit of translator<sup>2</sup>.

In total, we are providing three complete sets of the documents, in both English and Farsi. In accordance with pages 12-13 of the Court's Foreign Mailing Instructions we are providing two sets for service on Defendant and a set of documents for the Court's file.

We have also enclosed pre-paid FedEx label and envelope for delivery to the address above, delivery from the Please note that our firm FedEx account number is 628354049.

We further enclose a cashier's check in the amount of \$2,275.00 made payable to "U.S. Embassy Bern."

---

<sup>2</sup> The affidavit of the translator comports with the requirements of NY CPLR 2101(b).

**Anderson Kill P.C.**

February 18, 2020

Page 3

Should you have any questions or require any additional information please do not hesitate to contact me.

Regards,

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February 18, 2020

Clerk of the Court, Ruby J. Krajick  
United States District Court  
Southern District of New York  
Office of the Clerk  
500 Pearl Street  
New York, New York 10007

Re: *Chang Don Kim et al. v. Islamic Republic of Iran*  
Case No.: 1:18-cv-11870 (GBD) (SN); RE: Service of Judgment  
via the Foreign Sovereign Immunities Act

Dear Clerk of the Court, Ruby J. Krajick:

I represent the Plaintiffs in the above-referenced action.

I am writing to request you effect service of the Partial Final Judgment, dated February 5, 2020, MDL ECF No. 5847, on the Defendant, Islamic Republic of Iran, pursuant to 28 U.S.C. §1608(a)(4), at the following address:

Minister of Foreign Affairs  
Ministry of Foreign Affairs of the Islamic Republic of Iran  
Iman Khomeini Avenue  
Tehran, Iran  
ATTN: H.E. Mohammad Javad Zarif

Service on Iran cannot be effected under 28 U.S.C. Sections 1608(a)(1) and (2) because the United States and Iran do not have any special arrangement for service of process upon Iran in accordance with sub-section (1), nor is service permitted by any applicable international convention under the provisions of sub-section (2).<sup>1</sup> See *Valore v. Islamic Republic of Iran*, 700 F. Supp. 2d 52, 70 (D.D.C. 2010). As you are aware, service by mail pursuant to 28 U.S.C. § 1608(a)(3) cannot be effected as demonstrated by the fact that service of original process by mail in the initial phase of the action was not effective and such futile efforts need not be repeated here.

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**Anderson Kill P.C.**

February 18, 2020

Page 2

On June 11, 2019, Plaintiffs served the complaint on Defendant pursuant to 28 U.S.C. § 1608(a)(4). Defendant failed to file an answer or responsive pleading within 60 days from the date that service was effectuated and Partial Final Judgment was entered on February 5, 2020.

Pursuant to 28 U.S.C. § 1608(e), and 22 CFR § 93.2, Plaintiffs now request that Defendant is served with the judgment pursuant to 28 U.S.C. § 1608(a)(4) by first sending the enclosed documents to the following address, which will arrange for diplomatic service:

U.S. Department of State  
SA-29, 4th Floor, 2201 C Street NW  
Washington, DC 20520.  
Attn: Secretary of State, Director of Consular Services, Office of Policy Review and Inter-Agency Liaison (CA/OCS/PRI)

Enclosed please find copies of the following documents, in English and Farsi:

- a. Notice of Judgment prepared in accordance with 22 CFR § 93.2
- b. Order of Partial Final Judgment for Damages and Liability, dated September 10, 2019
- c. Order of Partial Final Judgment for Damages, dated February 5, 2020
- d. Instructions for Appealing Judgment
- e. A copy of 28 U.S.C. 1330, 28 U.S.C. 1391, 28 U.S.C. 1441, and the Foreign Sovereign Immunities Act (28 U.S.C. 1602, et seq.)
- f. Affidavit of translator<sup>2</sup>.

In total, we are providing three complete sets of the documents, in both English and Farsi. In accordance with pages 12-13 of the Court's Foreign Mailing Instructions we are providing two sets for service on Defendant and a set of documents for the Court's file.

We have also enclosed pre-paid FedEx label and envelope for delivery to the address above. Please note that our firm FedEx account number is 628354049.

We further enclose a cashier's check in the amount of \$2,275.00 made payable to "U.S. Embassy Bern."

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**Anderson Kill P.C.**

February 18, 2020

Page 3

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Regards,

Jerry S. Goldman

Enclosures

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February 18, 2020

Clerk of the Court, Ruby J. Krajick  
United States District Court  
Southern District of New York  
Office of the Clerk  
500 Pearl Street  
New York, New York 10007

Re: *Maureen Moody-Theinert et al. v. Islamic Republic of Iran*  
Case No.: 1:18-cv-11876 (GBD) (SN); RE: Service of Judgment  
via the Foreign Sovereign Immunities Act

Dear Clerk of the Court, Ruby J. Krajick:

I represent the Plaintiffs in the above-referenced action.

I am writing to request you effect service of the Partial Final Judgment, dated February 5, 2020, MDL ECF Nos. 5852, on the Defendant, Islamic Republic of Iran, pursuant to 28 U.S.C. §1608(a)(4), at the following address:

Minister of Foreign Affairs  
Ministry of Foreign Affairs of the Islamic Republic of Iran  
Iman Khomeini Avenue  
Tehran, Iran  
ATTN: H.E. Mohammad Javad Zarif

Service on Iran cannot be effected under 28 U.S.C. Sections 1608(a)(1) and (2) because the United States and Iran do not have any special arrangement for service of process upon Iran in accordance with sub-section (1), nor is service permitted by any applicable international convention under the provisions of sub-section (2).<sup>1</sup> See *Valore v. Islamic Republic of Iran*, 700 F. Supp. 2d 52, 70 (D.D.C. 2010). As you are aware, service by mail pursuant to 28 U.S.C. § 1608(a)(3) cannot be effected as demonstrated by the fact that service of original process by mail in the initial phase of the action was not effective and such futile efforts need not be repeated here.

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Anderson Kill P.C.

February 18, 2020

Page 2

On June 11, 2019, Plaintiffs served the complaint on Defendant pursuant to 28 U.S.C. § 1608(a)(4). Defendant failed to file an answer or responsive pleading within 60 days from the date that service was effectuated and Partial Final Judgment was entered February 5, 2020.

Pursuant to 28 U.S.C. § 1608(e), and 22 CFR § 93.2, Plaintiffs now request that Defendant is served with the judgment pursuant to 28 U.S.C. § 1608(a)(4) by first sending the enclosed documents to the following address, which will arrange for diplomatic service:

U.S. Department of State  
SA-29, 4th Floor, 2201 C Street NW  
Washington, DC 20520.  
Attn: Secretary of State, Director of Consular Services, Office of Policy Review and Inter-Agency Liaison (CA/OCS/PRI)

Enclosed please find copies of the following documents, in English and Farsi:

- a. Notice of Judgment prepared in accordance with 22 CFR § 93.2
- b. Order of Partial Final Judgment for Damages and Liability, dated September 3, 2019
- c. Order of Partial Final Judgment for Damages, dated February 5, 2020
- d. Instructions for Appealing Judgment
- e. A copy of 28 U.S.C. 1330, 28 U.S.C. 1391, 28 U.S.C. 1441, and the Foreign Sovereign Immunities Act (28 U.S.C. 1602, et seq.)
- f. Affidavit of translator<sup>2</sup>.

In total, we are providing three complete sets of the documents, in both English and Farsi. In accordance with pages 12-13 of the Court's Foreign Mailing Instructions we are providing two sets for service on Defendant and a set of documents for the Court's file.

We have also enclosed pre-paid FedEx label and envelope for delivery to the address above. Please note that our firm FedEx account number is 628354049.

We further enclose a cashier's check in the amount of \$2,275.00 made payable to "U.S. Embassy Bern."

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**Anderson Kill P.C.**

February 18, 2020

Page 3

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Regards,

Jerry S. Goldman

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February 18, 2020

Clerk of the Court, Ruby J. Krajick  
United States District Court  
Southern District of New York  
Office of the Clerk  
500 Pearl Street  
New York, New York 10007

Re: *Gordon Aamoth Sr. et al. v. Islamic Republic of Iran*  
Case No.: 1:18-cv-12276 (GBD) (SN); RE: Service of Judgment  
via the Foreign Sovereign Immunities Act

Dear Clerk of the Court, Ruby J. Krajick:

I represent the Plaintiffs in the above-referenced action.

I am writing to request you effect service of the Partial Final Judgment, dated February 5, 2020, MDL ECF No. 5845, on the Defendant, Islamic Republic of Iran, pursuant to 28 U.S.C. §1608(a)(4), at the following address:

Minister of Foreign Affairs  
Ministry of Foreign Affairs of the Islamic Republic of Iran  
Iman Khomeini Avenue  
Tehran, Iran  
ATTN: H.E. Mohammad Javad Zarif

Service on Iran cannot be effected under 28 U.S.C. Sections 1608(a)(1) and (2) because the United States and Iran do not have any special arrangement for service of process upon Iran in accordance with sub-section (1), nor is service permitted by any applicable international convention under the provisions of sub-section (2).<sup>1</sup> See *Valore v. Islamic Republic of Iran*, 700 F. Supp. 2d 52, 70 (D.D.C. 2010). As you are aware, service by mail pursuant to 28 U.S.C. § 1608(a)(3) cannot be effected as demonstrated by the fact that service of original process by mail in the initial phase of the action was not effective and such futile efforts need not be repeated here.

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**Anderson Kill P.C.**

February 18, 2020

Page 2

On June 11, 2019, Plaintiffs served the complaint on Defendant pursuant to 28 U.S.C. § 1608(a)(4). Defendant failed to file an answer or responsive pleading within 60 days from the date that service was effectuated and Partial Final Judgment were entered on February 5, 2020.

Pursuant to 28 U.S.C. § 1608(e), and 22 CFR § 93.2, Plaintiffs now request that Defendant is served with the judgment pursuant to 28 U.S.C. § 1608(a)(4) by first sending the enclosed documents to the following address, which will arrange for diplomatic service:

U.S. Department of State  
SA-29, 4th Floor, 2201 C Street NW  
Washington, DC 20520.  
Attn: Secretary of State, Director of Consular Services, Office of Policy  
Review and Inter-Agency Liaison (CA/OCS/PRI)

Enclosed please find copies of the following documents, in English and Farsi:

- a. Notice of Judgment prepared in accordance with 22 CFR § 93.2
- b. Order of Partial Final Judgment for Damages and Liability, dated September 3, 2019
- c. Order of Partial Final Judgment for Damages, dated February 5, 2020
- d. Instructions for Appealing Judgment
- e. A copy of 28 U.S.C. 1330, 28 U.S.C. 1391, 28 U.S.C. 1441, and the Foreign Sovereign Immunities Act (28 U.S.C. 1602, et seq.)
- f. Affidavit of translator<sup>2</sup>.

In total, we are providing three complete sets of the documents, in both English and Farsi. In accordance with pages 12-13 of the Court's Foreign Mailing Instructions we are providing two sets for service on Defendant and a set of documents for the Court's file.

We have also enclosed pre-paid FedEx label and envelope for delivery to the address above. Please note that our firm FedEx account number is 628354049.

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<sup>2</sup> The affidavit of the translator comports with the requirements of NY CPLR 2101(b).

**Anderson Kill P.C.**

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United States District Court  
Southern District of New York  
Office of the Clerk  
500 Pearl Street  
New York, New York 10007

Re: *Marinella Hemenway et al. v. Islamic Republic of Iran*  
Case No.: 1:18-cv-12277 (GBD) (SN); RE: Service of Judgment  
via the Foreign Sovereign Immunities Act

Dear Clerk of the Court, Ruby J. Krajick:

I represent the Plaintiffs in the above-referenced action.

I am writing to request you effect service of the Partial Final Judgment, dated February 5, 2020, MDL ECF No. 5865, on the Defendant, Islamic Republic of Iran, pursuant to 28 U.S.C. §1608(a)(4), at the following address:

Minister of Foreign Affairs  
Ministry of Foreign Affairs of the Islamic Republic of Iran  
Iman Khomeini Avenue  
Tehran, Iran  
ATTN: H.E. Mohammad Javad Zarif

Service on Iran cannot be effected under 28 U.S.C. Sections 1608(a)(1) and (2) because the United States and Iran do not have any special arrangement for service of process upon Iran in accordance with sub-section (1), nor is service permitted by any applicable international convention under the provisions of sub-section (2).<sup>1</sup> See *Valore v. Islamic Republic of Iran*, 700 F. Supp. 2d 52, 70 (D.D.C. 2010). As you are aware, service by mail pursuant to 28 U.S.C. § 1608(a)(3) cannot be effected as demonstrated by the fact that service of original process by mail in the initial phase of the action was not effective and such futile efforts need not be repeated here.

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<sup>1</sup> Iran is not a signatory to the convention of the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters.

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**Anderson Kill P.C.**

February 18, 2020

Page 2

On June 11, 2019, Plaintiffs served the complaint on Defendant pursuant to 28 U.S.C. § 1608(a)(4). Defendant failed to file an answer or responsive pleading within 60 days from the date that service was effectuated and Partial Final Judgment was entered on February 5, 2020.

Pursuant to 28 U.S.C. § 1608(e), and 22 CFR § 93.2, Plaintiffs now request that Defendant is served with the judgment pursuant to 28 U.S.C. § 1608(a)(4) by first sending the enclosed documents to the following address, which will arrange for diplomatic service:

U.S. Department of State  
SA-29, 4th Floor, 2201 C Street NW  
Washington, DC 20520.  
Attn: Secretary of State, Director of Consular Services, Office of Policy Review and Inter-Agency Liaison (CA/OCS/PRI)

Enclosed please find copies of the following documents, in English and Farsi:

- a. Notice of Judgment prepared in accordance with 22 CFR § 93.2
- b. Order of Partial Final Judgment for Damages and Liability, dated September 3, 2019
- c. Order of Partial Final Judgment for Damages, dated February 5, 2020
- d. Instructions for Appealing Judgment
- e. A copy of 28 U.S.C. 1330, 28 U.S.C. 1391, 28 U.S.C. 1441, and the Foreign Sovereign Immunities Act (28 U.S.C. 1602, et seq.)
- f. Affidavit of translator<sup>2</sup>.

In total, we are providing three complete sets of the documents, in both English and Farsi. In accordance with pages 12-13 of the Court's Foreign Mailing Instructions we are providing two sets for service on Defendant and a set of documents for the Court's file.

We have also enclosed pre-paid FedEx label and envelope for delivery to the address above. Please note that our firm FedEx account number is 628354049.

We further enclose a cashier's check in the amount of \$2,275.00 made payable to "U.S. Embassy Bern."

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<sup>2</sup> The affidavit of the translator comports with the requirements of NY CPLR 2101(b).

**Anderson Kill P.C.**

February 18, 2020

Page 3

Should you have any questions or require any additional information  
please do not hesitate to contact me.

Regards,

Jerry S. Goldman

Enclosures

# ANDERSON KILL P.C.

Attorneys and Counselors at Law

1251 AVENUE OF THE AMERICAS ■ NEW YORK, NY 10020  
TELEPHONE: 212-278-1000 ■ FAX: 212-278-1733  
www.andersonkill.com

Jerry S. Goldman, Esq.  
Jgoldman@andersonkill.com  
212-278-1569

By Hand Delivery

February 18, 2020

Clerk of the Court, Ruby J. Krajick  
United States District Court  
Southern District of New York  
Office of the Clerk  
500 Pearl Street  
New York, New York 10007

Re: *Laurence Schlissel et al. v. Islamic Republic of Iran*  
Case No.: 1:18-cv-05331 (GBD) (SN); RE: Service of Judgment  
via the Foreign Sovereign Immunities Act

Dear Clerk of the Court, Ruby J. Krajick:

I represent the Plaintiffs in the above-referenced action.

I am writing to request you effect service of the Partial Final Judgment, dated February 5, 2020, MDL ECF No. 5849, on the Defendant, Islamic Republic of Iran, pursuant to 28 U.S.C. §1608(a)(4), at the following address:

Minister of Foreign Affairs  
Ministry of Foreign Affairs of the Islamic Republic of Iran  
Iman Khomeini Avenue  
Tehran, Iran  
ATTN: H.E. Mohammad Javad Zarif

Service on Iran cannot be effected under 28 U.S.C. Sections 1608(a)(1) and (2) because the United States and Iran do not have any special arrangement for service of process upon Iran in accordance with sub-section (1), nor is service permitted by any applicable international convention under the provisions of sub-section (2).<sup>1</sup> See *Valore v. Islamic Republic of Iran*, 700 F. Supp. 2d 52, 70 (D.D.C. 2010). As you are aware, service by mail pursuant to 28 U.S.C. § 1608(a)(3) cannot be effected as demonstrated by the fact that service of original process by mail in the initial phase of the action was not effective and such futile efforts need not be repeated here.

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<sup>1</sup> Iran is not a signatory to the convention of the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters.

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**Anderson Kill P.C.**

February 18, 2020

Page 2

On September 26, 2018, Plaintiffs served the complaint on Defendant pursuant to 28 U.S.C. § 1608(a)(4). Defendant failed to file an answer or responsive pleading within 60 days from the date that service was effectuated and Partial Final Judgment was entered on February 5, 2020.

Pursuant to 28 U.S.C. § 1608(e), and 22 CFR § 93.2, Plaintiffs now request that Defendant is served with the judgment pursuant to 28 U.S.C. § 1608(a)(4) by first sending the enclosed documents to the following address, which will arrange for diplomatic service:

U.S. Department of State  
SA-29, 4th Floor, 2201 C Street NW  
Washington, DC 20520.  
Attn: Secretary of State, Director of Consular Services, Office of Policy Review and Inter-Agency Liaison (CA/OCS/PRI)

Enclosed please find copies of the following documents, in English and Farsi:

- a. Notice of Judgment prepared in accordance with 22 CFR § 93.2
- b. Orders of Judgment for Liability, dated June 21, 2019
- c. Order of Partial Final Judgment for Damages, dated February 5, 2020
- d. Instructions for Appealing the Judgments
- e. Copies of 28 U.S.C. 1330, 28 U.S.C. 1391, 28 U.S.C. 1441, and the Foreign Sovereign Immunities Act (28 U.S.C. 1602, et seq.)
- f. Affidavit of translator<sup>2</sup>.

In total, we are providing three complete sets of the documents, in both English and Farsi. In accordance with pages 12-13 of the Court's Foreign Mailing Instructions we are providing two sets for service on Defendant and a set of documents for the Court's file.

We have also enclosed pre-paid FedEx label and envelope for delivery to the address above. Please note that our firm FedEx account number is 628354049.

We further enclose a cashier's check in the amount of \$2,275.00 made payable to "U.S. Embassy Bern."

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<sup>2</sup> The affidavit of the translator comports with the requirements of NY CPLR 2101(b).

# ANDERSON KILL P.C.

Attorneys and Counselors at Law

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Jerry S. Goldman, Esq.  
Jgoldman@andersonkill.com  
212-278-1569

By Hand Delivery

February 18, 2020

Clerk of the Court, Ruby J. Krajick  
United States District Court  
Southern District of New York  
Office of the Clerk  
500 Pearl Street  
New York, New York 10007

Re: *Alexander Jimenez et al. v. Islamic Republic of Iran*  
Case No.: 1:18-cv-11875 (GBD) (SN); RE: Service of Judgment  
via the Foreign Sovereign Immunities Act

Dear Clerk of the Court, Ruby J. Krajick:

I represent the Plaintiffs in the above-referenced action.

I am writing to request you effect service of the Partial Final Judgment, dated February 12, 2020, MDL ECF No. 5929, on the Defendant, Islamic Republic of Iran, pursuant to 28 U.S.C. §1608(a)(4), at the following address:

Minister of Foreign Affairs  
Ministry of Foreign Affairs of the Islamic Republic of Iran  
Iman Khomeini Avenue  
Tehran, Iran  
ATTN: H.E. Mohammad Javad Zarif

Service on Iran cannot be effected under 28 U.S.C. Sections 1608(a)(1) and (2) because the United States and Iran do not have any special arrangement for service of process upon Iran in accordance with sub-section (1), nor is service permitted by any applicable international convention under the provisions of sub-section (2).<sup>1</sup> See *Valore v. Islamic Republic of Iran*, 700 F. Supp. 2d 52, 70 (D.D.C. 2010). As you are aware, service by mail pursuant to 28 U.S.C. § 1608(a)(3) cannot be effected as demonstrated by the fact that service of original process by mail in the initial phase of the action was not effective and such futile efforts need not be repeated here.

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<sup>1</sup> Iran is not a signatory to the convention of the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters.

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**Anderson Kill P.C.**

February 18, 2020  
Page 2

On June 11, 2019, Plaintiffs served the complaint on Defendant pursuant to 28 U.S.C. § 1608(a)(4). Defendant failed to file an answer or responsive pleading within 60 days from the date that service was effectuated and Partial Final Judgment was entered on February 12, 2020.

Pursuant to 28 U.S.C. § 1608(e), and 22 CFR § 93.2, Plaintiffs now request that Defendant is served with the judgment pursuant to 28 U.S.C. § 1608(a)(4) by first sending the enclosed documents to the following address, which will arrange for diplomatic service:

U.S. Department of State  
SA-29, 4th Floor, 2201 C Street NW  
Washington, DC 20520.  
Attn: Secretary of State, Director of Consular Services, Office of Policy  
Review and Inter-Agency Liaison (CA/OCS/PRI)

Enclosed please find copies of the following documents, in English and Farsi:

- a. Notice of Judgment prepared in accordance with 22 CFR § 93.2
- b. Order of Partial Final Judgment for Liability, dated September 13, 2019
- c. Order of Partial Final Judgment for Damages, dated February 12, 2020
- d. Instructions for Appealing the Judgment
- e. A copy of 28 U.S.C. 1330, 28 U.S.C. 1391, 28 U.S.C. 1441, and the Foreign Sovereign Immunities Act (28 U.S.C. 1602, et seq.)
- f. Affidavit of translator<sup>2</sup>.

In total, we are providing three complete sets of the documents, in both English and Farsi. In accordance with pages 12-13 of the Court's Foreign Mailing Instructions we are providing two sets for service on Defendant and a set of documents for the Court's file.

We have also enclosed pre-paid FedEx label and envelope for delivery to the address above. Please note that our firm FedEx account number is 628354049.

We further enclose a cashier's check in the amount of \$2,275.00 made payable to "U.S. Embassy Bern."

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<sup>2</sup> The affidavit of the translator comports with the requirements of NY CPLR 2101(b).

**Anderson Kill P.C.**

February 18, 2020  
Page 3

Should you have any questions or require any additional information  
please do not hesitate to contact me.

Regards,

A handwritten signature in black ink, appearing to be "Jerry S. Goldman", with a large, stylized initial "J" and "G".

Jerry S. Goldman

Enclosures

# ANDERSON KILL P.C.

Attorneys and Counselors at Law

1251 AVENUE OF THE AMERICAS ■ NEW YORK, NY 10020  
TELEPHONE: 212-278-1000 ■ FAX: 212-278-1733  
www.andersonkill.com

Jerry S. Goldman, Esq.  
Jgoldman@andersonkill.com  
212-278-1569

By Hand Delivery

February 18, 2020

Clerk of the Court, Ruby J. Krajick  
United States District Court  
Southern District of New York  
Office of the Clerk  
500 Pearl Street  
New York, New York 10007

Re: *Horace Morris et al. v. Islamic Republic of Iran*  
Case No.: 1:18-cv-05321 (GBD) (SN); RE: Service of Judgment  
via the Foreign Sovereign Immunities Act

Dear Clerk of the Court, Ruby J. Krajick:

I represent the Plaintiffs in the above-referenced action.

I am writing to request you effect service of the Partial Final Judgment, dated February 12, 2020, MDL ECF No. 5919, on the Defendant, Islamic Republic of Iran, pursuant to 28 U.S.C. §1608(a)(4), at the following address:

Minister of Foreign Affairs  
Ministry of Foreign Affairs of the Islamic Republic of Iran  
Iman Khomeini Avenue  
Tehran, Iran  
ATTN: H.E. Mohammad Javad Zarif

Service on Iran cannot be effected under 28 U.S.C. Sections 1608(a)(1) and (2) because the United States and Iran do not have any special arrangement for service of process upon Iran in accordance with sub-section (1), nor is service permitted by any applicable international convention under the provisions of sub-section (2).<sup>1</sup> See *Valore v. Islamic Republic of Iran*, 700 F. Supp. 2d 52, 70 (D.D.C. 2010). As you are aware, service by mail pursuant to 28 U.S.C. § 1608(a)(3) cannot be effected as

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**Anderson Kill P.C.**

February 18, 2020

Page 2

demonstrated by the fact that service of original process by mail in the initial phase of the action was not effective and such futile efforts need not be repeated here.

On September 26, 2018, Plaintiffs served the complaint on Defendant pursuant to 28 U.S.C. § 1608(a)(4). Defendant failed to file an answer or responsive pleading within 60 days from the date that service was effectuated and Partial Final Judgment was entered on February 12, 2020.

Pursuant to 28 U.S.C. § 1608(e), and 22 CFR § 93.2, Plaintiffs now request that Defendant is served with the judgment pursuant to 28 U.S.C. § 1608(a)(4) by first sending the enclosed documents to the following address, which will arrange for diplomatic service:

U.S. Department of State  
SA-29, 4th Floor, 2201 C Street NW  
Washington, DC 20520.  
Attn: Secretary of State, Director of Consular Services, Office of Policy  
Review and Inter-Agency Liaison (CA/OCS/PRI)

Enclosed please find copies of the following documents, in English and Farsi:

- a. Notice of Judgment prepared in accordance with 22 CFR § 93.2
- b. Order of Judgment for Liability, dated June 21, 2019
- c. Order of Partial Final Judgment for Damages, dated February 12, 2020
- d. Instructions for Appealing Judgment
- e. A copy of 28 U.S.C. 1330, 28 U.S.C. 1391, 28 U.S.C. 1441, and the Foreign Sovereign Immunities Act (28 U.S.C. 1602, et seq.)
- f. Affidavit of translator<sup>2</sup>.

In total, we are providing three complete sets of the documents, in both English and Farsi. In accordance with pages 12-13 of the Court's Foreign Mailing Instructions we are providing two sets for service on Defendant and a set of documents for the Court's file.

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We further enclose a cashier's check in the amount of \$2,275.00 made payable to "U.S. Embassy Bern."

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<sup>2</sup> The affidavit of the translator comports with the requirements of NY CPLR 2101(b).


**Anderson Kill P.C.**

February 18, 2020

Page 3

Should you have any questions or require any additional information  
please do not hesitate to contact me.

Regards,



Jerry S. Goldman

Enclosures